

EXHIBIT H

(Redacted)

Hon. Jed S. Rakoff
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street New York
NY 10007-1312

[REDACTED]
England
[REDACTED]

4TH June 2023

Dear Judge, Rakoff,

My name is Niamh McGuinness, I am 23 years old and in a relationship with Thomas Mooney for the past four years.

I currently still reside with my parents in Liverpool. I am employed by Tradewind Recruitment as a Primary School Teacher. I attended Edge Hill University from September 2018 to July 2021 attaining a BA Honours 2:1 in Primary Mathematics with QTS.

I am the cousin of Joseph O'Connor, myself and my sister Molly McGuinness are Joseph's only female cousins. Joseph and I are close in age, with their only being 6 months difference between us. I would say myself and Joseph are very close, when I am around Joseph, I feel Joseph is at ease with me, being able to confide and communicate with me, which he doesn't with other people.

My sister and I would be taken to Spain each year for the summer holidays with our grandmother and stay with my Aunt Sandra, Joseph, and Joseph's older brother Jake. Joseph had lots of friends and was very popular in the enclosed complex where he lived and by other holiday makers who were visiting their holiday apartments during school holidays. Joseph would introduce myself and my sister to his friends and we would all play together, over the years we gained a good relationship. The first time I visited Spain in 2004, Joseph was only 5 years old, but I remember being shocked by how quickly he picked up the Spanish Language and how fluent he was. He would talk to the other residents, when going out to dinner order all our meals in Spanish for us. He was very happy living in Spain.

When Joseph got arrested in July 2021, I was extremely worried and upset about Joseph going to prison as I know a lot of people will not understand his personality.

When seeing the news articles images and hearing how upset and distant he was in court, I know he was going to be very vulnerable going into a hostile environment, around males of all different ages.

This would be an alien environment completely the opposite to Joseph's normality.

[REDACTED]

On a prison visit to see Joseph, I could tell how uncomfortable and out of place he was, but I felt he was putting on a smile and brave face for myself, my Aunt Sandra, and my boyfriend Tom, to display to us he was 'okay' but I could tell he was distressed.

Joseph speaks from the heart and is an honest person, Joseph does have difficulty seeing and understanding others' viewpoints. He does not understand social norms and is often perplexed if he upsets someone.

On the visit to prison, he told Sandra his mum, she looked pretty, she thanked him, then he said "well you are, even with your wrinkles and you being old, you should try and get Botox before you start looking as wrinkly as nan".

This made us laugh but he was just being how we all know him to be, honest without realising that it can be too much to hear sometimes.

He had no idea why we were laughing and there is little point in explaining it to him.

Joseph is a very compassionate and caring person. Joseph would make sure the people around him are okay without him even realising.

When Joseph used to come and visit the UK, he stayed with our grandmother. I would see him a lot, when our grandmother used to offer us something Joseph would reply 'You can't do that you are an old woman' and complete the task himself, even though she was very capable. Joseph has displayed courage and caring qualities always, defending persons' he believed to be vulnerable. Joseph does not like or understand a person who is a bully. He accepts people for who they are.

When Joseph returned to the UK in 2011, he found it quite difficult to make friends, [REDACTED]

Joseph was set in his routine in Spain, Joseph had difficulty understanding others' viewpoints and could not understand why they had to live in the UK. He took months to settle in life in the U.K., but it is arguable that the culture and variance in the schooling system caused enormous damage to him and ultimately led to his withdrawal from life and reclusive living, which only added to his problems of social isolation and pushed him towards online gaming and unhealthy friendships.

During the time he returned back to the UK, we saw Joseph less and less. He would always stay in his room and always be gaming, I believe this became an obsessive behaviour and made him feel at ease. Joseph would come to the occasional family gathering but was very quiet and not engaged. You could tell by his body language; he did not want to be there. Joseph felt comfortable around my dad Brian McGuinness and would mostly engage with him at the gatherings. Joseph was content gaming and did not see typical teenage behaviour activities such as 'parties or hanging out with friends' fun and thought they was pointless. During his time in the UK, Joseph stayed out of trouble.

Myself and my boyfriend Tom went on a holiday to my Aunt Sandra's apartment complex in August 2019. At this time Joseph was known for just staying in his room all day, I was expecting Joseph to be very quiet and hardly spend time with us and I would not have taken this personally, its just the way he is.

When we arrived in Spain, my Aunt Sandra told Joseph to meet myself and Tom at the complex gate and help us with our luggage.

Joseph was not there, and we were waiting in the hot sun for ages. I had to call Sandra and have her come and let us in.

She was looking for Joseph as he had no phone and she was worried why he had just disappeared. We later found out he had been invited into his neighbours' house to look at at their new kitchen. When Sandra asked him and said, 'Did you not tell them you were going to get your cousin at the gate' Joseph replied 'No, I couldn't say no, that would be rude they invited me in I wanted to make them happy.'

Even though Joseph had not lived in Spain for many years, Joseph to my surprise picked back up and became back fluent in Spanish. Tom and I invited Joseph out for a meal, to my surprise Joseph came out with us a few times in the two weeks we were on holiday.

Joseph and Tom got on, but he still was reluctant to come out to restaurants which he hardly did, he would just order food in.

Joseph was known for being awake during the night and sleeping during the day, during the two weeks Joseph would get up during the day and sometimes join in with the activities and plans myself and Tom had.

Tom and Joseph got a good bond, which Joseph did not have with many people. I think Joseph enjoyed having a companion a similar age to himself and spending time with him. Joseph broke out his shell during the two weeks and he enjoyed talking about his interest and his life in Spain then and when he was younger.

However, he was still extremely shy and self-conscious when others were present and in restaurants Tom and I had to order for him as he did not like to speak to the serving staff as it made him really anxious.

Joseph is a caring and kind boy who literally would help a stranger in the street if needed.

He is known for finding stray animals and bringing them home to Sandra to look after, he thinks this is normal and the dogs and cats were basically the things he loved most.

He would have them feature in his You Tube videos he used to create linked to his gaming and he never cares when other gamers made fun of him because of his pets.

I hope that you find this helpful and assists you in understanding the character of Joseph and allows you to be sympathetic and fair to him and his difficulties.

Your Faithfully

Niamh McGuinness